



November 22, 2016

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Subject: Request for **Site Vapor Evaluation and Site Management Plan**; Fuel Leak Case No. RO0003143 (GeoTracker Global ID T10000006106), Paramount UST, 811 Paramount Road, Oakland, CA 94610

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case files including the *Data Gap Investigation to Evaluate Potential Indoor Air Vapor Intrusion by Soil-Gas Related to a Former Residential Underground Heating Oil Tank*, dated September 27, 2016, submitted on your behalf by Stellar Environmental Solutions, Inc. (Stellar). Thank you for submitting the report; it is moving the case forward.

The referenced site is the location of a former heating oil underground storage tank (UST) that is being investigated within the underground petroleum storage tank program, and appears to meet the majority of General and Media-Specific Criteria within the State Water Resource Control Board's (SWRCBs) Low Threat Closure Policy (LTCP). However, due to the lack of a bioattenuation zone (Total Total Petroleum Hydrocarbons are reported to be 396 milligrams per kilogram (mg/kg) at five feet, in excess of the allowable 100 mg/kg under the LTCP), as well as a series of consistently unusual soil vapor sample analytical results (including elevated benzene vapor concentrations up to 600 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ] that have consistently been reported in soil vapor at a residential heating oil UST), the site has not met the Petroleum Vapor Intrusion to Indoor Air Media-Specific Criteria of the Policy.

As background, previous vapor testing of the soil vapor well at the site consistently documented atypical vapor analytical results between soil vapor sampling events including substantial changes in Total Petroleum Hydrocarbons as gasoline (TPHg; at a heating oil site), benzene, ethanol, heptane, methylene chloride, tetrachloroethene (PCE), and toluene. PCE concentrations rose from 94 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to 7,500  $\mu\text{g}/\text{m}^3$  during the previous sampling event, while leak tracer concentrations remained within normal parameters. It has previously been surmised that the standard practice of using batch certified Summa canisters may have caused the consistently atypical results.

Previous indoor air samples had additionally detected naphthalene, of potential concern due to the potential for lateral migration from an unusually high concentration of naphthalene (25.2 mg/kg) found in soil at a depth of 12 feet below grade surface (bgs) immediately adjacent and beneath the former underground storage tank (UST).

The current report documents the collection of additional soil gas, crawl space, basement, and living room indoor air, and outdoor ambient air vapor samples. Soil vapor data from soil vapor well SG-5.5 continues to document elevated TPHg and elevated benzene soil vapor concentrations inconsistent with its reported former use as a heating oil UST. However, with the use of individually certified summa canisters, the recent data collection appears to have eliminated tetrachloroethene (PCE) and a number of other atypical vapor contaminants as potential contaminants at the site.

The report concludes that the basement indoor air sample continues to document potential vapor intrusion by Total Petroleum Hydrocarbons as diesel (TPHd) and naphthalene vapors, potentially from lateral migration of contaminants from the former heating oil UST or conveyance piping through soil. Additionally, naphthalene in the living room indoor air is moderately elevated over appropriate residential indoor air Environmental Screening Levels (ESLs). Otherwise, vapor sampling of the crawl space and

living room indoor air were similar to outdoor ambient air samples; however, TPHg in indoor air may remain as a contaminant of concern due to previous elevated crawl space concentrations. The report recommended consideration of the installation of an interior air ventilation / filter system in the basement, or the periodic resampling of basement air for hydrocarbon vapors.

At this juncture ACDEH requests that you address the Technical Comments provided below and submit the documents requested.

### **TECHNICAL COMMENTS**

- 1. Request for A Meeting** – In order to further discuss the subject environmental case, ACDEH requests a meeting to review available options for the site. Please notify ACDEH of a minimum of three available dates and times after the first of the year, by the date identified below, and ACDEH will attempt to identify dates and times that all are mutually available.
- 2. Feasibility Study / Corrective Action Plan** – Due to the proximity of contaminated soil to the house, and consistently elevated naphthalene, and potentially TPHd and TPHg, indoor air vapor concentrations, and elevated TPHg and benzene soil vapor concentrations, it appears appropriate to address residual contamination proximal to the foundation.

Please generate a Draft Feasibility Study / Corrective Action Plan (FS/CAP) that meets the provisions of section 2725 of the UST regulations (CCR, Title 23, Chapter 16, section 2600, et seq.) and includes the following minimum information:

- Proposed cleanup goals and the basis for cleanup goals.
- Summary of site characterization data.
- Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors.
- Evaluation of a minimum of three active remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative.
- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
- Post-remediation monitoring.
- Schedule for implementation of cleanup.

Please note that public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACDEH review. Upon ACDEH approval of a Draft CAP, ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention below and schedule:

- **December 16, 2016** – Notification of Available Dates  
Please email your case worker.
- **60 Days After Meeting** – Draft Feasibility Study / Corrective Action Plan  
File to be named: RO3143\_CAP\_R\_yyyy-mm-dd

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These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and  
Electronic Report Upload (ftp) Instructions

cc: Henry Pietropaoli, Stellar Environmental Solutions, Inc, 2198 Sixth Street, Suite 201, Berkeley, CA 94710, (Sent via electronic mail to: [hpietropaoli@stellar-environmental.com](mailto:hpietropaoli@stellar-environmental.com))

Richard Makdisi, Stellar Environmental Solutions, Inc, 2198 Sixth Street, Suite 201, Berkeley, CA 94710, (Sent via electronic mail to: [rmakdisi@stellar-environmental.com](mailto:rmakdisi@stellar-environmental.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File; GeoTracker

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

## REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.